

**REMARKS**

In the Office Action, claims 1-46 were rejected. All of the pending claims are believed to be clearly allowable over the cited art. Accordingly, reconsideration and allowance of all the claims are requested.

The present application includes independent claims 1, 14, 24, 32 and 39. All these claims were rejected in the Office Action as unpatentable under 35 U.S.C. §102(e) as anticipated by Kuribayashi et al. Applicants note that the Examiner inadvertently included a different Kuribayashi et al. reference, U.S. Patent No. 6,334,115 with the copy of the Office Action. Although the latter reference was not made of record, it is believed to be cumulative of the correctly cited reference by Kuribayashi et al. In the present Response, the Kuribayashi et al. "846" reference is addressed, as it was in the Office Action.

**Claim 1 and the Claims Depending Therefrom**

In the Office Action, the Examiner analyzed the Kuribayashi et al. reference to include all of the elements of claim 1. Applicants note that there was no analysis whatsoever separate or distinct of the other independent claims. These will be addressed below.

The Examiner is said to have identified in the Kuribayashi et al. reference teachings relating to storing in a memory object of each component of a system data representative of the respective component and of a physical configuration of the component. The Examiner cited a passage of the reference at col. 2, lines 36-43. In fact, the reference does not recite this feature in any way. Rather, both the passage cited by the Examiner, and the remainder of the reference, relate to the provision of an electronic catalog. The passage cited by the Examiner reads:

The electronic components can thus be rationally searched and selected in a short time while the display screen is changed through the search or look-up operation. The electronic catalog EC using a storing medium such as a CD-ROM hold the image data for displaying various data of various kinds of electronic components on a screen in an image data file IMF as shown in Figure 23. Kuribayashi et al., col. 2, lines 36-43.

In fact, the passages relied upon by the Examiner relate to prior art discussed in the reference. The reproduced passage clearly relates to an electronic catalog that is stored in a medium such as a CD-ROM. Claim 1, on the contrary, recites that *the data is stored in a memory object of each component* of the recited system. The CD-ROM storage of the catalog in the prior art discussed by Kuribayashi et al. is not equivalent in any way to the storage of data representative of a respective component and of a physical configuration the component *in a memory object of the component itself*.

Further, claim 1 recites that such data is accessed from the memory objects and a representation of the system is generated based upon the accessed data. The Kuribayashi et al. reference, and particularly the passages relied upon by the Examiner, in no way teach these procedures. Rather, the reference simply teaches that catalog data, stored in electronic form, can be accessed from a storage medium, such as a CD-ROM, for display of certain types of pages. However, again, this information is *not accessed* from the components themselves or memory objects stored in the components.

Because the Kuribayashi et al. reference clearly does not teach the steps of claim 1, or any equivalent steps, the reference cannot anticipate claim 1. Accordingly, claim 1 and the claims depending therefrom are believed to be clearly patentable over Kuribayashi et al. Their reconsideration and allowance are requested.

**Claim 14 and the Claims Depending Therefrom**

As noted above, the Examiner did not address any distinction between claim 1 and claim 14. Inasmuch as the Examiner's rejection is identical on both of these claims, claim 14 is believed to be equally patentable for the reasons summarized above with respect to claim 1. Furthermore, claim 14 recites additional subject matter not addressed by the Examiner. Most notably, claim 14 adds the generation of a database including component designation data and physical location data. The Examiner did not contend that the cited reference discloses or even suggests such database generation. Accordingly, the Examiner has failed to establish a *prima facie* case of anticipation on this point alone.

Claim 14, and the claims depending therefrom, are therefore believed to be clearly patentable over the cited reference. Their reconsideration and allowance are requested.

**Claim 24 and the Claims Depending Therefrom**

Claim 24 was also not addressed with any specificity by the Examiner. Applicants first note that claim 24 includes recitations not found in any way in claim 1. These recitations were not addressed by the Examiner. Claim 24 is believed to be patentable for the same reasons as claim 1, and also for the additional subject matter that it recites. For example, claim 24 recites that components are polled for component designation data and physical disposition data, and that a real time elevational view of the system is generated based upon this data. The Kuribayashi et al. reference does not disclose such processes, nor does the Examiner even contend that it does. Accordingly, the Examiner has failed to establish a *prima facie* case of anticipation of claim 24. Claim 24 and the claims depending therefrom are therefore believed to be clearly patentable over the cited reference, and their reconsideration and allowance are requested.

**Claim 32 and the Claims Depending Therefrom**

Similarly, the Examiner did not address the subject matter of claim 32 with any specificity. Claim 32 is a system claim reciting a plurality of electrical components, with

each component including a memory object allocated for component designation data and physical location data. The claim further recites a data network linking the components, and a monitoring station linked to the components via the network. A processor of the monitoring station is configured to access the data from the components and to generate and display a representation of the system.

As noted above with regards to claim 1, the cited reference in no way discloses storing information in such components or accessing the information from the components for a generation of any display whatsoever. Because the reference fails in this regard, and because the Examiner did not address any of the elements of claim 32 or how they would be anticipated by the reference, a *prima facie* case of anticipation has not been made out. Accordingly, claim 32 and the claims depending therefrom are believed to be clearly patentable over the cited reference, and their reconsideration and allowance are requested.

**Claim 39 and the Claims Depending Therefrom**

As with the previous independent claims, claim 39 was not addressed with any specificity. Applicants note that its recitations and scope are different from those of claim 1. Claim 39 is directed to a networked motor control center that includes a plurality of electrical power control components disposed in an enclosure. Each of the components has a memory object for storing component designation data and physical configuration data. A data network links the electrical components, and a monitoring station is linked to the components via the network. The monitoring station includes a processor that is configured to access the component designation data and physical location data from the components via the network and to generate and display a representation of the system.

As noted above, the Kuribayashi et al. reference does not disclose storing such data in components or accessing the data from components for generation of a view of any type. Moreover, the Examiner did not contend that the reference discloses such

recitations. Accordingly, a *prima facie* case of anticipation has not been made out with regards to claim 39. For at least these reasons, claim 39 and the claims depending therefrom are believed to be clearly allowable over the cited reference, and their reconsideration and allowance are requested.

**Conclusion**

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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